

PRESENTMENT DATE AND TIME: March 9, 2010 noon (Eastern Time)
OBJECTION DEADLINE: March 9, 2010 at 11:30am (Eastern Time)

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Attorneys for Movants
Sarajuan Gilvary & Marla Soffer, Esquire

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i> ,	:	Case No. 09-50026
Debtors	:	(Jointly Administered)

**NOTICE OF PRESENTMENT OF PROPOSED ORDER RULING ON MOTIONS TO
LIFT AUTOMATIC STAYS (DOCUMENT NO's 4541 and 4703)**

PLEASE TAKE NOTICE that upon the annexed proposed order, dated March 2, 2010 (the “Order”) of Movants Sarajuan Gilvary and Marla Soffer, Esquire (collectively, the “Movants”), the Movants will present the attached proposed Order to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on March 9, 2010 noon (Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the proposed Order must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system,

and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on

(i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (vii) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.); (viii) Marshall, Dennehey, Warner, Coleman & Goggin, Woodland Falls Corporate Park, Suite 300, 200 Lake Drive East, Cherry Hill, NJ 08002, (Attn: Walter E. Kawalec, Esquire); and (ix) Kennedy, Lipski & McDade, 1818 Market Street, 25th Floor, Philadelphia, Pennsylvania 19103 (Attn: Nancy E. Campbell, Esquire), so as to be received no later than **11:30 a.m. on March 9, 2010 (Eastern Time)** (the "Objection Deadline"). Unless objections are received by the Objection Deadline, the Stipulation and Order may be signed.

Dated: New York, New York

March 4, 2010

/s/ Eric G. Zajac, Esquire
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UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11
: Case No. 09-50026
MOTORS LIQUIDATION COMPANY, *et al.*, :
f/k/a General Motors Corp., *et al.*, :
Debtors :
_____x_____

ORDER

FOR THE REASONS SET FORTH ON THE RECORD during a hearing conducted on March 2, 2010:

1. the Motion for Relief from Stay filed by Sarajuan Gilvary (Document No: **4541**) is GRANTED;
2. The Motion for Relief from Stay filed by Marla Soffer, Esquire, Administratrix of the Estate of David Arenas, deceased (Document No: **4703**) is GRANTED.
3. Any stays imposed by 11 U.S.C. § 362 and/or other provisions of the Bankruptcy Code in the cases captioned *Sara Gilvary v. Pompey Dodge, Inc. et al.*, Philadelphia County, Pennsylvania, Court of Common Pleas, March Term, 2007 No. 03736 and *Soffer v. M&M Motors*, Pennsylvania Superior Court, Eastern District, No. 2011 EDA 2008 (on appeal from the Court of Common Pleas, November Term, 2007 no. 02064), are LIFTED to the extent they were any impediment to Movants proceeding against the dealerships, Pompey Dodge, Inc., and M&M Motors (“the dealerships”) in the respective state court actions.
4. For the reasons stated in more detail on the record, to the extent that any stays imposed under federal law have been an impediment to pursuit of the state law claims against the dealerships, they no longer are.
5. To the extent that any Party or interested person seeks further relief or clarification from the Bankruptcy Court with respect to any matter of federal law, this Court shall retain jurisdiction without prejudice to any party taking or opposing any position before this Court.
6. The dealerships have 15 business days from the date of entry of this Order to file

protective proofs of claim for indemnification if they so choose.

Dated: New York, New York
March 2, 2010

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(Document No. 4541)

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Attorneys for the United States Treasury

So Ordered this _____ day of March, 2010.

United States Bankruptcy Judge